

REMARKS/ARGUMENTS

Claims 1, 2, and 27 have been amended without prejudice or disclaimer. Claims No new matter has been added. Claims 1-9 and 27-28 remain in the application. Applicants respectfully request reconsideration of this application

Claim Rejections:

Claims 1-9 and 27-28 were rejected under 35U.S.C. 103(a) as being unpatentable over Hutchison, IV et al. (6,725,061) in view of Kung (6,718,182).

Applicant amends in part (independent claims 1 and 2) and respectfully traverses in part (claims 4, 6 and 27). Applicant's invention utilizes a radio-resident microcontroller (106) that accesses accessory device descriptors stored in the accessory (102) to configure the accessory and its interface for proper operation. The device descriptors of Applicants' invention are not executable code, but information to configure the radio microcontroller. No radio device driver or executable code is stored in Applicants' accessory. Claim 4 recites that the radio reads the contents of the single wire device and configures the external radio interface in response thereto. Claim 6 recites the external radio interface automatically being configured via the radio microcontroller. Independent claims 1, 2 and 27 have been amended to more closely align with claims 4 and 6. Claim 1 has been amended to recite portable communication device software in the portable communication device reading the descriptors and configuring the configurable external interface in response thereto. Claim 2 has been amended to recite radio software in the radio for reading the interface configuration information and the event mapping information contained in the descriptors, and configuring the configurable external interface and processing events without the use of any microcontroller within the accessory. Claim 27 has been amended to recite the physical configuration descriptor and event mapping descriptor for configuring the interface system without a microcontroller in the accessory via the communication device.

All rejections are based on a combination on Hutchison and Kung. Kung teaches an accessory with a memory device that contains executable code. Indeed, all independent claims in Kung include the limitation of having executable programs stored in the accessory. Applicant's accessory does not contain executable code in the context of the current application. Executable code in the accessory is never used for accessory detection or interface configuration in Applicant's invention.

Referring to Figure 2 of Kung, accessory 120 contains peripheral circuit 130 (the "meat" of the accessory") and memory device 140. Memory 140 contains peripheral driver program 142 and initialization program 144. Kung teaches that 140 "becomes an extension of memory 40 of the cellular telephone" (col. 3, line 41). Applicant's invention does not require storing executable code as does Kung with "driver program" 142 and "initialization program" 144.

Furthermore, Kung teaches that initialization program 144 is executed once for device configuration followed by use of driver program 142 which provides functionality to the user interface (col 3, lines 45-60). Applicant's invention has no requirement for interfacing to a user interface program to operate. Column 4, line 65 to col. 5, line 8 states "the primary purpose of the init program 144 is to initialize the peripheral circuit 130 and to integrate the software of the peripheral driver program 142 with the software of the cellular telephone." Applicant's invention has no initialization software stored in accessory 120. Also, Kung teaches that "the initialization program **must** link with the user interface program 142 (col. 4, lines 3-4). Applicant's invention requires no such linkage.

Another embodiment shown in Figure 4 of Kung and explained in col. 5, lines 39-65, provides a specific example where accessory 120 is a networking accessory, and driver program 142 running on processor 30 provides a menu option on display 14 of phone 10. Pressing the new menu feature will execute functionality in driver program 142 that operates accessory 120 (col. 5, lines 57-65).

Figure 5 of Kung shows another embodiment where accessory 120 does not have peripheral accessory functionality other than operating purely as an external memory device (col. 6, lines 6-16). This embodiment contains an "application data set" 348, however this embodiment still requires the step of executing a program 344 stored in memory 340 of accessory 300. Initialization program 344, which is executable code on accessory 300 and is responsible for initialization/acting upon the application data set 348 (col. 6, lines 40-42). In contrast, Applicant's invention has no initialization program 344, has no application program 342. Applicant's "physical configuration descriptors" and "event mapping descriptors" are present, and are acted upon by executable code present in the radio 10 and internal memory 40 - not in memory of the accessory. Configuration descriptors and event mapping descriptors are not the equivalent of Kung's executable code.

Figure 6 is a specific implementation of the embodiment in Figure 5, utilizing application data set 348 and application program 442. It should be noted that the name "application data set" is obviously associated with application program 342, both by name (both begin with "application") and further supported by the cited example (col. 6, lines 59-63). The Application Data Set 348 in Kung does not control the interface 320, but is merely data within the scope of application program 342, which does not control interface 320. In contrast, Applicant's invention utilizes physical configuration and event mapping descriptors in memory 120 which are used by a driver in radio 104. This driver is generic and not specific to accessory 100, 200, or 300, and when used in connection with the physical configuration and event mapping descriptors configures interface 120/320 for the operation of peripheral functionality.

Applicant respectfully disagrees with the Examiner's assertion that "initialization program 144 and software driver code 142" are equivalent to "event mapping descriptors" in Applicant's invention. Event mapping descriptors are a portion of a non-executable data stored in the accessory, and acted upon by driver code always present in the radio. Kung does not teach that application data set 348 is in any way associated with the operation or configuration of port 120/320. Furthermore, Kung does not teach that the

application data set is used directly via a program resident in radio 10, but instead teaches application data set 348 is associated with application program 342 which is in Kung's accessory. In another embodiment, Kung teaches of initialization program 144 to configure the accessory, but program 144 is executable code on accessory 100. In this embodiment, there is no Application Data set or any data set.

None of the cited references taken individually or combined teach or suggest that which is claimed by Applicants' invention. Accordingly, the independent claims are in condition for allowance. Claims 3, 5, 7-9 and 28 are dependent claims providing further limitations to what are believed to be allowable independent claims and hence are also in condition for allowance.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

The Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney or agent at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

The Commissioner is hereby authorized to charge Deposit Account 502117,
Motorola, Inc, with any fees which may be required in the prosecution of this application.

Respectfully submitted,

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